

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose

This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.

II. Directions

1. Please complete a separate form for each issue.
2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

III. Submitting Carrier(s) General Information

Submitted by: **Time Warner Telecom**

Contact: **Pamela Sherwood**
Telephone Number: (317)-713-8977
e-mail: Pamela.sherwood@twtelecom.com

Subject Matter Expert (SME): **Jennifer Turssso**
Telephone Number: (303)-566-6013
e-mail: Jennifer.turssso@twtelecom.com

Authorized Representative: **Pamela Sherwood**

IV. Issue Identification

Name: **Interconnection Trunk Billing**
Brief Description: **SBC consistently bills TWTC for two-way interconnection trunk groups used by both SBC and TWTC, although the interconnection agreement clearly indicates that TWTC will not be billed for those trunk groups. SBC has failed to make a change in its system so that the trunks are not billed (zero rated), and every month TWTC has to dispute the bills.**

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? **This has been an ongoing problem for years, at least since 2000.**

2. How many occurrences and approximately over how long a period of time? **Over this period of time, we have identified the circuits as being billed on at least 3 different BANs.**
3. Is it a recurring problem? **Yes**
4. Your belief as to the cause of the problem. **SBC's system defaults to billed instead of zero-rated for trunks.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. **SBC has agreed with our interpretation of the interconnection agreement, but has not made the system change.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **Medium**
7. Any other pertinent information?

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Yes. Every month in bill disputes.**
2. Was this issue escalated for dispute resolution? **No.** If so, when and in what forum?
3. Last known position of the opposing carrier. **SBC has applied credits for most of these trunks and the rest are in the disputes process.**
4. Were any bill adjustments made to resolve this issue? **Yes, but it takes months to resolve each one.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made? **Not that we are aware of.**

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

TWTC believes SBC needs to make a system change.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

For clarification, SBC does not bill for trunks for Local Interconnection. Charges are applied to transport facilities that carry the trunks. SBC initiated a project during the 4th quarter of 2000 to begin billing for End Office Integration Service (EOIS) circuits in place in SBC Midwest between a CLEC's Point of Interconnection (POI) and the CLEC's switch or Point of Presence (POP) in the LATA. This initiative was consistent with language found in the ICAs and pertinent tariffs. Facilities on the CLEC side of the POI were to be billed at either access rates or UNE rates (as determined by the individual CLEC contracts). Facilities on the SBC side of the POI were to continue to remain zero-rated (no charges were applicable). In error, the project established access billing on all EOIS circuits without determining whether the facility was located on the SBC or CLEC side of the POI, or whether access or UNE rates applied.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.

Indirectly, the issue involves contract and tariff interpretations. The error was not in document interpretation, but rather, in the fact that there was no mechanism in place to allow the billing systems to differentiate between EOIS circuits and Access circuits, and no safeguards in place to determine on which side of the POI the circuits were built.

3. What performance measures can be implemented to monitor the desired system operation? N/A
4. Any other pertinent information? N/A

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. See above.
2. Were any bill adjustments made to resolve this issue?
Yes. Billing for Direct End Office Trunks (DEOTs), which should be zero-rated, was corrected. Credits were issued and applied to the June and/or July, 2003 bills.
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).

The Account Team handled the communication. The Account Manager provided the credit and account information to a Time Warner representative on or about July 7, 2003.

4. Identify any other carrier(s) known to have experienced similar problems. Allegiance, Focal, Globaleyes, ICG, Intermedia, KMC, Level 3, McLeod, Ovation, Pae Tech, Winstar, WorldCom, XO Communications, Gabriel, MCI, Sigecom, Time Warner, US Exchange, Adelphia, Buckeye, Choice One, Cincinnati Bell, Frontier, AT&T, TDS Metrocom
5. Did you identify any other problems arising from or related to this issue? No.
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). SBC's NIT (Network Interconnection Team) leads manually inventoried each and every active circuit carrying local traffic across a Local Interconnection network. With this inventory, each circuit was evaluated and billing applicability was determined. The existing architectures were compared with pre-planning letters, contracts, and tariffs. Circuits that were billed incorrectly were identified and corrected. The Account Teams reviewed the contracts to determine an accurate stake date for the credits. The Local Service Center issued all of the correcting orders and made all the appropriate changes to the records to insure accurate billing from this point forward.
7. Were any policies or procedures changed to address this issue? If so, what changes were made?
SBC has developed and implemented an online tool that identifies the CLECs, their interconnection architectures, whether billing does or does not apply, and other pertinent information for the LSC Service Representative to use to determine correct billing. For occasions when specific information is not populated in the online tool, SBC implemented a process by which a Service Representative may contact the appropriate NIT lead person to determine the correct billing. A project is currently under way to establish unique Classes of Service to differentiate circuits established for local interconnection from those established for access services. By establishing these new Classes of Service, SBC can establish and apply specific local interconnection billing requirements. With the online billing tool, the NIT leads, and the implementation of the new Classes of Service, this billing error will not re-occur.

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact : *James Jermain*

Telephone Number: *608-252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Sherlyn Lovell*

Telephone Number: *214- 858-0174*

e-mail: *sl8621@sbc.com*

Authorized Representative: *Glen Sirles*

Telephone Number: *214-858-0700*

e-mail: *gs1066@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

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4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.

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e-mail: Pamela.sherwood@twtelecom.com

Subject Matter Expert (SME): **Jennifer Turssso**
Telephone Number: (303)-566-6013
e-mail: Jennifer.turssso@twtelecom.com

Authorized Representative: **Pamela Sherwood**

IV. Issue Identification

Name: **Electronic Invoicing**
Brief Description: **TWTC has requested a certain number of invoices be set up to default to electronic invoicing, instead of paper invoicing. Despite numerous requests, and updates to our CLEC Profile, SBC continues to send those invoices in hard copy – via paper.**

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? **This has been an ongoing problem for the last year. We first discovered it when we received our first EEL invoice**

in November of 2002 and it was sent in hard copy.

2. How many occurrences and approximately over how long a period of time? **This problem involves at least 4 different BANs.**
3. Is it a recurring problem? **Yes. Even after we were able to get an electronic bill one month, the next month we received a paper bill for the same BAN.**
4. Your belief as to the cause of the problem. **SBC has not changed its system to default TWTC's requested bills to electronic billing. Perhaps the system for designating electronic billing is set to paper for TWTC.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? **No.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **Medium**
7. Any other pertinent information?

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Yes. Every month when we get the paper bills. We have also placed several inquiries with our SBC account manager.**
2. Was this issue escalated for dispute resolution? If so, when and in what forum? **Yes. We had a conference call with our account manager to discuss many billing issues for our local invoices, including this one, on June 18, 2003.**
3. Last known position of the opposing carrier. **SBC believes we need to update our CLEC Profile, although it has been reviewed and updated twice.**
4. Were any bill adjustments made to resolve this issue? **No.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made? **Not that we are aware of. The paper bill limits our ability to audit and review certain of the bills.**

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

TWTC believes SBC needs to make a system change.

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC believes that there is some confusion regarding the "profile" that needed to be updated. While Time Warner did update the CLEC profile to reflect its desire to receive electronic billing, SBC indicated that it needed to submit a Flat File Request form to the IS Call Center in order to get NDM established. The IS Call Center refers to the Flat File Request form as a profile. The form was given to Time Warner in November 2002.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information? *No.*

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
Time Warner needs to submit the required Flat File Request form. Time Warner has not yet done so.
2. Were any bill adjustments made to resolve this issue? *No.*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *N/A*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *N/A*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *N/A*

IX. Opposing Carrier's General Information (to be completed after July 30, 2003, prehearing)

Submitted by: *SBC*

Contact : *James Jermain*
Telephone Number: *608-252-2359*
e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Doug Summers*
Telephone Number: *312- 335-6585*

e-mail: *ds6414@sbc.com*

Authorized Representative: *Glen Sirles*

Telephone Number: *214-858-0700*

e-mail: *gs1066@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

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Investigation into the Wholesale Billing Practices of
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Subject Matter Expert (SME): **Jennifer Turssso**
Telephone Number: (303)-566-6013
e-mail: Jennifer.turssso@twtelecom.com

Authorized Representative: **Pamela Sherwood**

IV. Issue Identification

Name: **Collocation Billing**

Brief Description: **SBC and TWTC have been working on auditing SBC's collocation bills over the last several months. SBC claims that during the merger, billing data was lost and therefore, several sites were not billed. SBC is conducting an audit of TWTC's physical and virtual collocation facilities, and started back billing TWTC in October of 2002.**

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? **This has been an ongoing problem for**

several months. We first noticed back billing in October of 2002 and issued disputes for the October and November invoices.

2. How many occurrences and approximately over how long a period of time? **This dispute has been ongoing since July of 2002 and involves at least 8 different BANs.**
3. Is it a recurring problem? **Yes**
4. Your belief as to the cause of the problem. **SBC claims to have lost billing records during the merger and is now attempting to reconstruct it.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? **Yes. Interconnection agreement and/or tariff as it relates to how far back SBC can bill for its own mistake, although TWTC believes it has been billed for all facilities. Also at issue is what rates should be applied.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **High**
7. Any other pertinent information?

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Yes. We have issued disputes and had conference calls on the issue. We issued disputes in October and November of 2002, and still did not have a resolution of those disputes by February of 2003. SBC continued to apply late payment charges to those disputes during this time.**
2. Was this issue escalated for dispute resolution? If so, when and in what forum? **Yes. In February, TWTC escalated this issue and SBC had responded to most issues by March of 2003 – but SBC simply denied the disputes and denied our disputes over the appropriateness of the late payment charges.**
3. Last known position of the opposing carrier. **SBC is conducting more site inventories and believes it can back bill.**
4. Were any bill adjustments made to resolve this issue? **Yes. After reviewing one site, SBC agreed it was billing in error in generating back billing charges, and credited TWTC.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made? **Not that we are aware of.**

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Depending on the outcome of the audit and cooperation TWTC receives from SBC, Commission action/clarification may or may not be needed.

VIII. Opposing Carrier's Response *(to be completed after July 30, 2003, prehearing)*

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
The items Time Warner alleges are at issue were the result of a physical inventory audit conducted to validate our records and ensure correct billing.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *No.*
3. What performance measures can be implemented to monitor the desired system operation?
None. The issue Time Warner has alleged in this filing is related to rate elements discovered during the physical inventory that were not previously billed. SBC billed Time Warner for the previously unbilled rate elements that Time Warner ordered. In addition, SBC issued credit adjustments totaling \$8,325.96 in Wisconsin for items that SBC discovered were billed incorrectly. SBC initiated debits and credits to Time Warner in accordance with the directions it received regarding Wisconsin's state tariff.
4. Any other pertinent information?
SBC has addressed all of the claims that Time Warner submitted in Wisconsin and has issued appropriate credit adjustments to Time Warner.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
See above. As of August 14, 2003, SBC did not have any open or unaddressed Time Warner claims. Time Warner has submitted only two claims to the Collocation Service Center (CSC) since January 21, 2003.
2. Were any bill adjustments made to resolve this issue?
SBC issued credit adjustments on twenty-five (25) of the forty-nine (49) claims submitted by Time Warner in Wisconsin. The adjustments totaled \$19,557. The credit adjustments were issued due to information that CSC initially received stating that the back billing limitations according to Wisconsin's state tariff were two years. Subsequent to that initial directive, the CSC was instructed that, according the Wisconsin state tariff, the back-billing limitations were one year. In total, Time Warner has received approximately \$27,883 in credit adjustments, which exceeds the amount of debit adjustments of \$18,617 on Time Warner's BAN's as a result of the physical inventory.
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
Time Warner was notified of adjustments via the resolution form that is sent to the CLEC on each and every resolved claim. In addition, the adjustments appeared on the Time Warner's invoice(s).

4. Identify any other carrier(s) known to have experienced similar problems.
TDS Metrocom (ACNA – MSN) and US Exchange/Choice One (ACNA's – USX/HOC) have submitted claims related to rate elements/quantities billed during the physical inventory.
5. Did you identify any other problems arising from or related to this issue?
Where a CLEC submitted a claim questioning the billing related to the physical inventory, SBC investigated that claim and, if it determined that an error was made, it issued the appropriate adjustments.
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
If SBC receives a claim from a customer on a particular issue, it audits the entire invoice for inaccuracies. SBC proactively issues credit and debit adjustments for any errors discovered over and above the issue presented by the customer. With respect to Time Warner's allegations of back billing past the limits allowed by the Wisconsin state tariff, SBC is auditing all of Time Warner's BAN's in Wisconsin to ensure that SBC did not back bill in excess of the limits.
7. Were any policies or procedures changed to address this issue? If so, what changes were made?
No policy or procedural changes have been made as a result of Time Warner's claims.

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Submitted by: *SBC*

Contact : *James Jermain*
Telephone Number: *608-252-2359*
e-mail: *jj8571@sbccom*

Subject Matter Expert (SME): *Jan Moody*
Telephone Number: *214-576-4486*
e-mail: *jm5958@sbccom*

Authorized Representative: *Sue West*
Telephone Number: *312-335-6532*
e-mail: *sw3273@sbccom*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*

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Telephone Number: **(303)-566-6013**
e-mail: **Jennifer.tursso@twtelecom.com**

Authorized Representative: **Pamela Sherwood**

IV. Issue Identification

Name: **Application of Credits**

Brief Description: **SBC does not apply credits to bills as requested. At times, SBC fails to communicate regarding the resolution of a dispute, or to completely read the dispute, and only issues a partial credit. Then, we get billed to fix the billing problem that we have identified, which results in additional disputes being issued by TWTC.**

V. Analysis of Issue

Please answer the following questions:

1. When this issue was first discovered? **This has been an ongoing problem for several months.**

2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem? **Yes**
4. Your belief as to the cause of the problem. **SBC may not have adequate processes in place to respond to disputes and to issue credits to the proper BANs.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? **No.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **Medium**
7. Any other pertinent information?

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Yes. We have had conference calls on the issue.**
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue? **The issue is to which BAN the credits are applied.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made? **Not that we are aware of.**

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

SBC definitely needs a process improvement, and perhaps a PM is in order to track that the credit was issued to the disputed BAN.

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
When the ASC receives a claim, it is investigated based on information submitted by the CLEC's, ie. BAN, invoice date. If after the investigation credits are applicable, those credits are applied to the BAN the CLEC provided. The ASC will move adjustments only when requested by the CLEC. The ASC procedure is to have a transfer request in writing from the CLEC.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *SBC does not believe this issue to involve an interpretation or application of law.*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information?
An example from TWTC would help to determine the actual end result of TWTC's statement. Without such an example, SBC's response necessarily is limited. In addition, the ASC can only investigate what is provided by the CLEC. Investigation by the ASC Marketing Support Specialist's (MSS) is limited when a CLEC provides minimal information as to what it is disputing.

Not all CLEC claims get 100% adjustment/credit. That is, if a CLEC submits a claim and only a partial credit is warranted, the CLEC will only receive a partial adjustment/credit. The topic of the resolution text has been covered numerous times with the MSSs in staff meetings. In addition, the content of a resolution text is covered in initial billing training classes. Also, the MSSs have a claims processing procedure, available in MetPro, that is used on each claim. That procedure provides that vital information is to be included in a response to the CLEC. This processing procedure has been in place since late in the 1st quarter of 2003.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
This document.
2. Were any bill adjustments made to resolve this issue?
If the investigation of the CLEC's claims uncovers that credits are applicable, those credits are applied to the BAN the CLEC provided.
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
Adjustments are communicated in the resolution text, informing the CLEC when and where on its bill it can view the credit.

4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *In an effort to proactively identify any issues regarding the claims process, the ASC implemented new procedures.*
7. Were any policies or procedures changed to address this issue? If so, what changes were made?
The ASC implemented the following processes: (1) A claims manager and assignment MSS to more efficiently track and distribute claims. (2) Claims email address to enable a CLEC to submit its claims to one central location. (3) Relook process for a CLEC to resubmit claims with new supporting documentation, other than what has been previously submitted, for claims that have been resolved with a denial back to the CLEC. (4) Major process to allow a CLEC another opportunity to submit its initial claim with the pertinent documentation needed to investigate versus denying its claim due to lack of documentation. (5) Claims resolution MSS to more efficiently extract resolutions in a consistent manner to be distributed to the CLEC.

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Contact *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Janis Campo*

Telephone Number: *(217) 757-2583*

e-mail: *jc1658@sbc.com.com*

Authorized Representative: *Sue West*

Telephone Number: *(312) 335-6532*

e-mail: *sw3273@sbc.com*

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6720-TI-183

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1. *Please complete a separate form for each issue.*
2. *Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
3. *Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
4. *Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: **Time Warner Telecom**

Contact: **Pamela Sherwood**

Telephone Number: **(317)-713-8977**

e-mail: **Pamela.sherwood@twtelecom.com**

Subject Matter Expert (SME): **Jennifer Tursso**

Telephone Number: **(303)-566-6013**

e-mail: **Jennifer.tursso@twtelecom.com**

Authorized Representative: **Pamela Sherwood**

Name: **E911 Rates**

Brief Description: **TWTC is unable to validate the rates SBC is charging us for E911 in the interconnection agreement or any tariff. TWTC has asked SBC for the source of the rates, but SBC has failed to answer TWTC's request which has been pending for over 4 months.**

Please answer the following questions:

1. **When this issue was first discovered? This has been an ongoing problem since March of 2003. We sent an inquiry to our disputes contact on April 18, 2003**

about the rates.

2. How many occurrences and approximately over how long a period of time? **This dispute involves at least 3 different BANs.**
3. Is it a recurring problem? **Depends on the rate validation.**
4. Your belief as to the cause of the problem. **Unknown.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? **Yes – we can't validate the rates in either our interconnection agreement or any tariff.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **High**
7. Any other pertinent information?

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Yes. We have asked for source data on the rates, and then we were referred to our SBC account manager. We first asked for rate source information on April 18, 2003 and were then referred to our SBC account manager on May 5, 2003. Despite several follow-up calls and emails, we have not heard back from our SBC account manager.**
2. Was this issue escalated for dispute resolution? If so, when and in what forum? **Yes. We requested a formal conference call with our account manager on June 18, 2003.**
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue? **Not yet. TWTC hasn't disputed the rates because the bills are confusing. SBC added new BANs that each appear to have one E911 circuit, and then SBC disconnected/moved those circuits to another BAN. The billing periods for those various BANs may or may not overlap and this also leads to more confusion.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made? **Not that we are aware of.**

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

We need to understand SBC's billing processes for E911, as well as its process on the creation and movement of BANs before we can recommend a solution.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
SBC's records indicate that TWTC's request for E911 information was incorporated with some additional questions. This issue was discussed along with the other items raised by TWTC on several conference calls. SBC's recollection is that the account team directed TWTC to the tariff. However, recognizing that TWTC raised this concern, the account team is in the process of contacting TWTC to ensure that its questions are addressed.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
The issue involves the application of tariff rates for Emergency Number Service Access.
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information?
Attached is a document that specifies the rates set forth in the Wisconsin wholesale tariff for Emergency Number Service Access (#20, Part 23, Sect 3).



F:\911 Product
Management\CLECs\

These are the same rates that were identified in the Pricing Matrices for Time Warner's Interconnection Agreement with SBC Wisconsin.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
Still unresolved.
2. Were any bill adjustments made to resolve this issue? *N/A*
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s). *N/A*
4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s). *None.*
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *No.*

Submitted by: *SBC*

Contact : *James Jermain*

Telephone Number: 608-252-2359

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Doug Summer*

Telephone Number: (312) 335-6585

e-mail: *ds6414@sbc..com*

Authorized Representative: *Glen Sirles*

Telephone Number: (214) 858-0700

e-mail: *gs1066@txmail.sbc.com*

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

I. Purpose <i>This form is designed to have carriers identify and document issues in advance of the July 30, 2003 prehearing conference. It will also be used to track issues as issues are discussed during subsequent prehearing conferences. Carriers are not precluded from raising additional issues at or even after the July 30, 2003 prehearing conference, but Carriers will be expected to complete this form as issues are subsequently raised. Notwithstanding, all carriers are encouraged to submit as many of their issues as possible prior to the July 30, 2003 prehearing conference. A date will be established at a subsequent prehearing conference after which no new issues will be permitted.</i>
II. Directions <ol style="list-style-type: none"> 1. Please complete a separate form for each issue. 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission. 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference. 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.
III. Submitting Carrier(s) General Information Submitted by: Time Warner Telecom Contact: Pamela Sherwood Telephone Number: (317)-713-8977 e-mail: <u>Pamela.sherwood@twtelecom.com</u> Subject Matter Expert (SME): Jennifer Tursso Telephone Number: (303)-566-6013 e-mail: <u>Jennifer.tursso@twtelecom.com</u> Authorized Representative: Pamela Sherwood
IV. Issue Identification Name: Application of Payments to Correct Invoice/BAN Brief Description: SBC does not apply payments made by TWTC to the invoice/BAN that TWTC designates. SBC's payment center staff makes its own decision regarding what bill to apply the payment to, and in some instances, the payment has been completely misapplied to other TWTC BANs. Instead of correcting the credit to the correct BAN, TWTC is forced to accept a credit on the incorrect BAN and issue another payment.
V. Analysis of Issue Please answer the following questions: <ol style="list-style-type: none"> 1. When this issue was first discovered? This has been an ongoing problem

throughout the first and second quarters of 2003.

2. How many occurrences and approximately over how long a period of time? **This problem involves one local BAN and several special access BANs.**
3. Is it a recurring problem? **Yes**
4. Your belief as to the cause of the problem. **SBC may not have adequate processes in place to ensure that payments are applied to the appropriate invoices/BANs.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? **No.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **High**
7. Any other pertinent information?

VI. Prior Attempts to Resolve the Issue *(Please do not re-argue your case here or submit supporting documents.)*

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Yes. We have had conference calls on the issue.**
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier. **SBC is aware that TWTC directs, on its checks, how to apply the payment.**
4. Were any bill adjustments made to resolve this issue? **The issue is to what BAN the payments are applied. When SBC applies a payment to the incorrect account, it bills us a late payment charge on the account we were attempting to pay, resulting in more disputes.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made? **Not that we are aware of.**

VII. Relief Sought

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

SBC definitely needs a process improvement, and perhaps a PM is in order to track that the payment was credited to the correct BAN/invoice.

VIII. Opposing Carrier's Response (to be completed after July 30, 2003, prehearing)

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

This issue is very much like TWTC Issue #4. Because payments are not applied in the ASC, the ASC is only aware of this issue when alerted by either the CLEC or the Payment Center. The ASC receives a claim, and it is then investigated based on information submitted by the CLEC's BAN invoice date. If after the investigation SBC determines that credits are applicable, those credits are applied to the BAN the CLEC provided. The ASC will move adjustments only when requested by the CLEC. The ASC procedure is to have a transfer request in writing from the CLEC. There is an instance where the payment center receives the remittance sheet for payments including credits. The payment center does not apply or transfer credits.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. *SBC does not believe this issue to involve an interpretation or application of law.*
3. What performance measures can be implemented to monitor the desired system operation? *N/A*
4. Any other pertinent information?

If the CLEC submits a claim using the claims template that was sent in accessible letter ACCESS02-306 (provided below), any adjustments or credits determined after investigation will be applied to the BAN/Invoice that the claim was submitted on.



access_02-306.doc

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier. *This document.*
2. Were any bill adjustments made to resolve this issue?
If SBC determines after investigation that credits are applicable, those credits are applied to the BAN the CLEC provided. The ASC will move adjustments only when requested by the CLEC. The ASC procedure is to have a transfer request in writing from the CLEC.
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
Adjustments are communicated in the resolution text, informing the CLEC when

and where on its bill it can view the credit.

4. Identify any other carrier(s) known to have experienced similar problems. *N/A*
5. Did you identify any other problems arising from or related to this issue? *No.*
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
Proactively, a new internal process was established for the Payment center to contact the ASC when credits are included on a remittance sheet.
7. Were any policies or procedures changed to address this issue? If so, what changes were made? *Yes. SBC established a procedure with POC's between the Payment center and the ASCs. When the Payment center receives a remittance sheet with a check that includes credits, the Payment center contacts the POC for the center to which the accounts are billed. The appropriate ASC then contacts its customer to get a "clean" remittance sheet, with only debit amounts to be paid on the accounts for the amount of the check.*

IX. Opposing Carrier's General Information *(to be completed after July 30, 2003, prehearing)*

Submitted by: *SBC*

Contact *Jim Jermain*

Telephone Number: *(608) 252-2359*

e-mail: *jj8571@sbc.com*

Subject Matter Expert (SME): *Janis Campo*

Telephone Number: *(217) 757-2583*

e-mail: *jc1658@sbc.com.com*

Authorized Representative: *Sue West*

Telephone Number: *(312) 335-6532*

e-mail: *sw3273@sbc.com*

X. Further Investigative Activities *(for staff use only)*

XI. Final Disposition *(for staff use only)*